

TIMOTHY J. WALSH (SBN 69509 )  
ATTORNEY AT LAW  
1319 TRAVIS BLVD  
FAIRFIELD, CA. 94533  
TEL: 707 429-1990  
FAX: 707 429-1998  
Attorney for Debtor

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF CALIFORNIA  
SACRAMENTO DIVISION

PAUL MERRICK ) Case No: 10-26085  
FELICIA MERRICK ) MOTION TO COMPEL ABANDONMENT  
Debtor. ) OF BUSINESS ASSETS  
) TJW-1  
) DATE: APRIL 13, 2010  
) TIME: 9:30 AM  
) DEPT C  
) COURTROOM 35  
JUDGE CHRISTOPHER M. KLEIN  
11USC554

DEBTOR'S MOTION TO COMPEL TRUSTEE TO ABANDON ASSETS OF BUSINESS, TO

WIT: "PAUL MERRICK CONSTRUCTION, A SOLE PROPRIETORSHIP

Debtors hereby move the Court for an order to compel the trustee to abandon the assets of property of the estate, to wit: business and assets of the same known as "PAUL MERRICK CONSTRUCTION a sole proprietorship.

The business is the sole proprietorship of the debtor and consists of contracting for building remodeling. The business is conducted from the debtor's home. Debtor has been in business for 18years. Debtor does not carry accounts receivable.

Debtors' business assets are valued in the petition at \$1000 and exempted for that amount.

Debtor has approximately \$5000 of unused exemptions per the wild card exemption to protect said assets. The assets consist primarily, of small hand tools.

1 This motion is presented in good faith, at the request of the trustee, and pursuant to guidelines of  
2 this Court.

3 WHEREFORE:

4 Debtors pray the Court enter an order to compel the trustee to abandon the business and business  
5 assets of the debtor, commonly known as Paul Merrick Construction.

6  
7  
8 Dated this 17<sup>th</sup> DAY OF March 2010

9  
10 /s/ Timothy J. Walsh  
11 TIMOTHY J. WALSH  
12 ATTORNEY AT LAW  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25